

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

THE CHESTER COUNTY HOSPITAL	:	CIVIL ACTION
	:	NO. 02-2746
v.	:	
	:	
INDEPENDENCE BLUE CROSS,	:	
QCC INSURANCE COMPANY,	:	
KEYSTONE HEALTH PLAN EAST, and	:	
KEYSTONE MERCY HEALTH PLAN	:	

**PLAINTIFF'S REPLY MEMORANDUM OF LAW IN SUPPORT OF ITS
MOTION FOR LEAVE TO FILE A SECOND AMENDED COMPLAINT**

FILED UNDER SEAL

CONFIDENTIAL UNDER PROTECTIVE ORDER

**THIS ENVELOPE WHICH IS BEING FILED UNDER SEAL CONTAINS
DOCUMENTS THAT ARE SUBJECT TO A PROTECTIVE ORDER
GOVERNING THE USE OF CONFIDENTIAL DISCOVERY MATERIAL**

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**PLAINTIFF'S MOTION FOR LEAVE TO FILE A REPLY
MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION
FOR LEAVE TO FILE A SECOND AMENDED COMPLAINT**

Plaintiff, The Chester County Hospital, by its attorneys, respectfully files this Motion for Leave to file a Reply Memorandum of Law in Support of Its Motion for Leave to File a Second Amended Complaint. In support of this Motion for Leave, Plaintiff incorporates the proposed Reply Memorandum of Law attached hereto as Exhibit "A".

On August 20, 2003, the Court entered the parties' stipulation allowing Plaintiff, subject to leave, to file a reply to Defendants' Opposition to Plaintiff's Motion for Leave to File a Second Amended Complaint on or before September 5, 2003. As evidenced by the parties' stipulation, Defendant does not oppose Plaintiff's Motion for Leave. Because Defendants' Opposition presents arguments related to the merits of Plaintiff's antitrust claims, Plaintiff seeks an opportunity to respond, as these issues could affect the outcome of this case. Accordingly, Plaintiff respectfully requests that the Court grant its Motion for Leave to File a Reply Memorandum of Law in Support of its Motion for Leave to File a Second Amended Complaint, and Order that the attached Reply Memorandum of Law be deemed filed with the Court.

Additionally, Plaintiff's Reply Memorandum of Law attaches documents designated confidential under the Court's August 19, 2003 Amended Protective Order. Therefore, pursuant to the terms of the Amended Protective Order, Plaintiff respectfully Moves to File its Reply Memorandum of Law in Support of Its Motion for Leave to File a Second Amended Complaint Under Seal.

Respectfully Submitted,

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ORDER

AND NOW, on this ____ day of _____, 2003, upon consideration of The Chester County Hospital's Motions for Leave to File a Reply Memorandum of Law in Support of Its Motion for Leave to File a Second Amended Complaint, and its Motion to file said Memorandum of Law Under Seal, it is hereby ORDERED that the Motions are GRANTED, and the Reply Memorandum of Law attached to said Motion for Leave is deemed filed.

BY THE COURT:

JOHN R. PADOVA
United States District Judge